

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:) IN CHAPTER 7
)
 F.B.N. Shipping Solutions, Inc.,) No. 09 B 49545
)
 Debtor(s),)

NOTICE OF MOTION

TO: Office of U.S. Trustee, Via CM/ECF
John J. Lynch, Via CM/ECF

PLEASE TAKE NOTICE that on the 26th day of February, 2010 at the hour of 9:30 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable **JOHN H. SQUIRES**, Bankruptcy Judge, at the DuPage County Courthouse, 505 North County Farm Road, Courtroom No. 4016, Wheaton, Illinois, or before such other Judge as may be sitting in his place and stead, and then and there present the attached Application, at which time and place you may appear, if you so see fit.

/s/ GINA B. KROL
GINA B. KROL
105 W. Madison St., Ste 1100
Chicago, IL 60602
312/368-0300

STATE OF ILLINOIS)
) SS
COUNTY OF C O O K)

GINA B. KROL, being first duly sworn on oath, deposes and states that she served a copy of the foregoing Notice together with a copy of the Application attached thereto, directed to the persons shown above, by Electronic Means, this 18th day of February, 2010.

/s/ GINA B. KROL

IN THE MATTER IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:)	IN CHAPTER 7
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APPLICATION TO EMPLOY ATTORNEYS FOR TRUSTEE

TO THE HONORABLE **JOHN H. SQUIRES**,
BANKRUPTCY JUDGE

Now comes GINA B. KROL, Trustee herein, and respectfully represents unto this Honorable Court as follows:

1. That she is the duly appointed, qualified and acting Trustee in the above-entitled proceeding.

2. That legal services in the nature of examination of legal documents, sale of assets, collection of accounts receivable, and prosecution of fraudulent conveyances and preferential transfers, are necessary for a thorough and proper administration of this estate.

3. Your Trustee further represents that JOSEPH E. COHEN, GINA B. KROL and YAN TEYTELMAN of the firm of COHEN & KROL are duly authorized to practice law before this Honorable Court, are familiar with bankruptcy proceedings and that no conflict exists between the Trustee, GINA B. KROL, the creditors herein, the Debtor, or any person whomsoever entrusted in the within proceedings.

4. Your Trustee further represents to this Honorable Court that it would be in the best interest of this Estate and of the creditors herein that the firm of COHEN & KROL be authorized to perform all legal duties and services and obligations as might be required in the administration of this Estate because the legal action that is to be undertaken is to examine legal documents, sell assets, collect accounts receivable, and prosecution of fraudulent conveyances and preferential transfers. COHEN & KROL has continually represented various Trustees in similar matters and are well versed in issues

facing this Trustee. Further, that the employment of COHEN & KROL as Attorney for the Trustee will substantially reduce the costs to the Estate, in that, the Trustee can work more efficiently with its own attorneys, save substantial telephone and conference time and reduce out-of-pocket expenses which may be incurred herein.

5. That compensation for such legal services be hereinafter determined in the within proceedings.

6. That to the best of the Trustee's knowledge, JOSEPH E. COHEN, GINA B. KROL and YAN TEYTELMAN of the firm of COHEN & KROL, have no connection with the Debtor, any creditor, any other party in interest including their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the U.S. Trustee.

7. That additional hereto and made a part hereof, is the Affidavit of JOSEPH E. COHEN, GINA B. KROL and YAN TEYTELMAN in compliance with the rules of this Court.

WHEREFORE, your Trustee, GINA B. KROL, prays for the entry of an order herein, authorizing your Trustee to employ JOSEPH E. COHEN, GINA B. KROL and YAN TEYTELMAN, Attorneys, of the firm of COHEN & KROL, to perform all legal services necessary or required in the administration of this Estate and a compensation for services as said attorneys to be hereinafter determined by this Court, and for such other and further relief as the Court shall deem equitable and proper.

GINA B. KROL
JOSEPH E. COHEN
YAN TEYTELMAN
COHEN & KROL
105 W. Madison St., Ste 1100
Chicago, IL 60602

GINA B. KROL, Trustee

/s/ GINA B. KROL
One of Attorneys for Trustee